

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

Southern District of Texas

JUL 19 2018

David J. Bradley, Clerk

United States of America
v.
Alondra Mendez
YOB: 1998 Citizenship: United States

Case No. M-18-1460-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 18, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841	Possession with Intent to Distribute Cocaine
21 U.S.C. § 952	Illegal Importation of Cocaine

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

7/19/18
Sworn to before me and signed in my presence.

Date: 7/18/20188:33 amCity and state: McAllen, Texas

Complainant's signature

Jorge L. Rodriguez, U.S., HSI TFO

Printed name and title

Judge's signature

U.S. Magistrate Peter Ormsby

Printed name and title

ATTACHMENT A

On July 18, 2018, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received a call from the U.S. Customs and Border Protection, Office of Field Operations (CBP/OFO) at the Hidalgo, Texas Port of Entry (POE). At approximately 9:30 A.M. CBP Officers (CBPOs) working pre-primary inspections and encountered the black Volkswagen Jetta with Texas license plates KRG-2327. The driver of the Volkswagen was identified as Alondra MENDEZ. Alondra MENDEZ claimed she was the owner of the vehicle and that she was traveling from Reynosa, Tamaulipas, Mexico, to McAllen, Texas, and would be doing some shopping in the McAllen area. CBP Canine Officer along with his Canine conducted an inspection of the Volkswagen. The canine gave a positive alert to the odor of narcotics within the vehicle. CBPOs referred the Volkswagen to secondary for further inspection.

At secondary inspection, the Volkswagen was taken to the Z-Portal for an x-ray examination which revealed anomalies in the trunk area. CBPO's inspected the trunk and extracted ten (10) packages weighing approximately 10.58 kilograms from an aftermarket compartment, which later field tested positive for cocaine.

In a post Miranda statement, Alondra MENDEZ Mendez stated to HSI Task Force Officers and HSI Special Agent that her mother is the owner of the vehicle. During the interview, Alondra MENDEZ initially gave inconsistent statements regarding ownership of the vehicle, the use of communication devices, and purpose for travel within the U.S. Alondra MENDEZ stated that she was initially approached and was asked to cross currency from the United States into Mexico. Alondra MENDEZ stated that she was asked by an acquaintance to cross a vehicle into the United States and was told where to drop it off once she made it across the Port of Entry. There, an unknown person was to pick up the vehicle and was supposed to give her an undisclosed amount of money for payment of crossing the vehicle into the United States.